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Before the
Federal Communications Commission
Washington, D.C. 20554

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AUG 12 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b),) MM Docket No. 98-____
Table of Allotments,) RM-____
FM Broadcast Stations.)
(Saltillo, Mississippi))

To: Chief, Allocations Branch

PETITION FOR RULEMAKING

Broadcasters & Publishers, Inc. ("BPI"), licensee of Station WWKZ(FM), Aberdeen, Mississippi, respectfully requests that the Commission amend Section 73.202(b) of the Commission's rules, the FM Table of Assignments, by allotting Channel 275C3 to Saltillo, Mississippi. In support thereof, the following is shown:

In a Report and Order released on June 19, 1998 (DA-1083), the Chief of the Allocations Branch denied a petition filed by Olvie E. Sisk, licensee of Station WCNA(FM), Channel 240C3, Potts Camp, Mississippi, which sought to reallocate Channel 240C3 from Potts Camp to Saltillo, and to modify the license of Station WCNA(FM) accordingly. BPI had proposed as a counterproposal in the Potts Camp/Saltillo proceeding the allotment of Channel 275C3 to Saltillo. It was the position of BPI that the community of Saltillo is deserving of a local broadcast transmission service but not at the expense of removing the community of Potts Camp's only local transmission. The Chief of the Allocations Branch, however, found that BPI's counterproposal was not mutually exclusive with the proposal of Olvie E. Sisk and concluded that it was unacceptable for consideration in the Potts Camp/Saltillo rulemaking proceeding.

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MMB

It is clear that Saltillo should be considered as a community for allotment purposes. Saltillo is an incorporated city located in the central portion of Lee County in Northeast Mississippi. According to the 1990 U.S. Census, the City of Saltillo has a population of 1,782 persons and Lee County has a population of 65,581 persons. No local broadcast service is currently available to the community of Saltillo.

As demonstrated in the attached Technical Statement of Kirk A. Tollett, BPI's consulting engineer, the proposed allotment is in full compliance with the Commission's rules, and Channel 275C3 could be assigned to Saltillo as that community's first local broadcast service. If Channel 275C3 were allotted to Saltillo, BPI will promptly apply for a construction permit and place the facility in operation at the earliest possible time.

WHEREFORE, for the foregoing reasons, BPI respectfully requests that the Commission amend the FM Table of Assignments by allotting Channel 275C3 to Saltillo.

Respectfully submitted,

BROADCASTERS AND PUBLISHERS, INC.

By 
Erwin G. Krasnow

Verner, Liipfert, Bernhard,
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901 15th Street, N.W., Suite 700
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Its Attorney

August 12, 1998

Prepared by:
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Technical Statement

Petition for Rule Making

Saltillo, Mississippi

TECHNICAL STATEMENT
In support of
PETITION FOR RULE MAKING
Broadcasters & Publishers, Inc.
Saltillo, Mississippi
August, 1998

INTRODUCTION

This technical statement has been prepared on behalf of Broadcasters & Publishers, Inc., ("BPI"), licensee of Radio Station WWKZ at Aberdeen, Mississippi. This statement is provided in support of a Petition for Rule Making, requesting a change in the FM Table of Assignments, Paragraph 73.202(b) of the FCC Rules as follows:

Location	Present	Proposed
Saltillo, Mississippi	None	275C3

COMMENTS

Saltillo, Mississippi is an incorporated City located in the central portion of Lee County, in Northeast Mississippi. 1990 U.S. Census figures for the City of Saltillo was 1,782 persons. The 1990 Census figures for Lee County were 65,581 persons. No local broadcast service is currently available to the City of Saltillo, Mississippi.

Figure 1, is a computer generated allocation study using the Commission's specified method of distance computations, demonstrating the assignability of FM Channel 275C3 to Saltillo, Mississippi. The Commission should note that Figure 1 indicates a short spacing to the Class C license of WRBO at New Albany, Mississippi and the allocation of WRBO Class C1 at Como, Mississippi. On June 15, 1998 WRBO filed a license to cover its Como, Mississippi facility (FCC file # BLH-980617KC) and therefore, these facility

proposed herein and the WRBO facility are no longer considered short spaced. The information contained in Figure 1, was utilized in preparation of the pertinent arcs contained in Figure 2.

Figure 2 is a full scale reproduction of a portion of a USGS 1:250,000 scale map entitled "Tupelo, Miss.; Ala.; Tenn.". Upon it has been superimposed a cross mark which represents the coordinates utilized in the preparation of this Report. The geographic coordinates selected for this study were:

N 34° 24' 09"

W 88° 33' 25"

Figure 2, details the area of Saltillo, Mississippi and the pertinent arcs from all co-channel as well as adjacent channel facilities, allocated, assigned or operational within 200 miles of the proposed allocation. Figure 2 demonstrates there is ample clearance to locate a tower site that would place the required unobstructed city grade signal, (70 dBu), over the entire City of Saltillo, Mississippi. It can be determined from Figure 2, that Channel 275C3 can be allocated to Saltillo, Mississippi with a site restriction of 12.2 kilometers to the east-northeast. Figure 3 contains a NOAA 1:500,000 scale map entitle "Memphis" upon which has been superimposed the predicted 70 dBu city grade contour of the proposed facility from the referenced site. Figure 3 clearly demonstrates the city grade signal of the proposed facility utilizing a hypothetical tower, with a center of radiation 100 meters above average terrain and an effective radiated power of twenty five kilowatts will encompass the community of Saltillo, Mississippi.

CONCLUSION

As can be gleaned from the attached figures, Channel 275C3 can be added to the Federal Communications Commission Table of Assignments with out the necessity of any other changes and without the creation of any new preclusion area. Based on this information, and the figures that are included in this Report, we believe that the proposed

assignment would be in full compliance with the Federal Communications Commission's Rules, and that Channel 275C3 could be assigned to Saltillo, Mississippi as that communities first local broadcast service.

Therefore, Broadcasters & Publishers, Inc., respectfully requests amendment of the Commission's Table of Assignments, Section 73.202(b), and will promptly apply for a construction permit, should the Federal Communications Commission make the requested assignment.

Respectfully,

A handwritten signature in black ink, appearing to read 'Kirk A. Tollett', with a stylized flourish at the end.

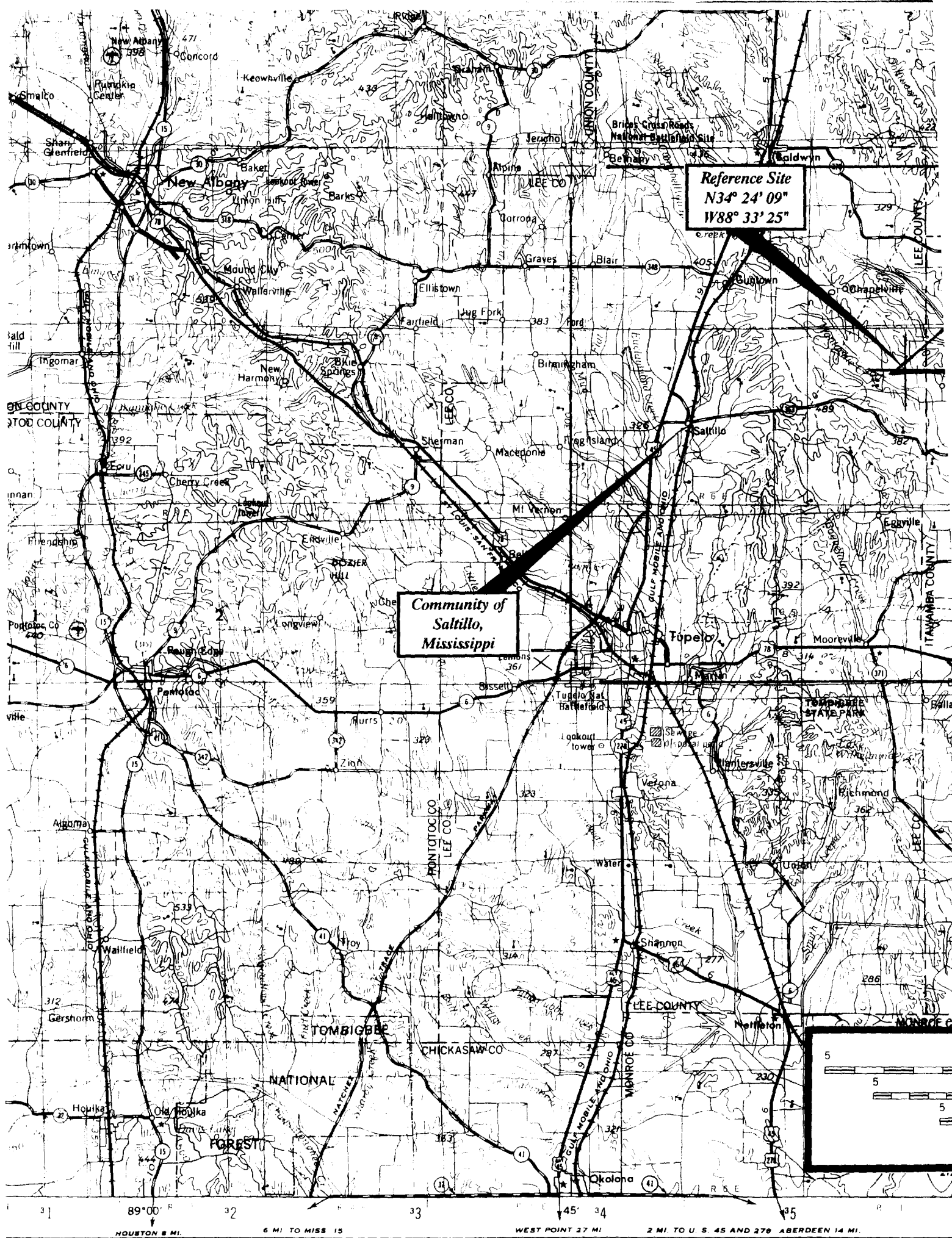
Kirk A. Tollett
Consultant to Broadcasters & Publishers, Inc.
August 7, 1998

FIGURE 1
FM SEPARATION STUDY
BROADCASTERS & PUBLISHERS, INC.
NEW FM CHANNEL 275 CLASS C3
SALTILLO, MISSISSIPPI

MAPFM search of channel 275C3 (102.9 MHz), at N. 34 24 9, W. 88 33 25.

Searching Channel 275C3 (102.9 MHz):

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
ALC	Hamilton	AL	221	A	U	61.0	12.0	121.3°	49.0
WERHEM	Hamilton	AL	221	A	L	61.0	12.0	121.3°	49.0
ALC	University	MS	221	A	U	89.9	12.0	273.4°	77.9
WUMS	University	MS	221	A	L	77.8	12.0	270.1°	65.8
WUMS	University	MS	221	A	C	77.8	12.0	270.1°	65.8
ALC	Ripley	MS	272	A	U	42.3	42.0	321.6°	0.3
ALC	Calhoun City	MS	272	A	U	92.4	42.0	228.9°	50.4
NEW	Calhoun City	MS	272	A	C	85.3	42.0	231.7°	43.3
WKZU	Ripley	MS	272	A	C	42.3	42.0	321.6°	0.3
WKZU	Ripley	MS	272	A	L	42.3	42.0	321.6°	0.3
ALC	Jasper	AL	273	C	U	147.9	96.0	133.7°	51.9
WOWC	Jasper	AL	273	C	L	147.9	96.0	133.7°	51.9
ALC	St. Florian	AL	274	A	V	102.5	89.0	53.5°	13.5
ALC	Memphis	TN	274	C1	U	145.2	144.0	306.5°	1.2
WEGR	Memphis	TN	274	C1	L	145.2	144.0	306.5°	1.2
ALC	Linden	AL	275	C2	U	231.3	177.0	158.1°	54.3
WKXX	Attalla	AL	275	A	L	221.8	142.0	102.4°	79.8
WNPTFM	Linden	AL	275	C2	L	233.9	177.0	157.0°	56.9
ALC	Jackson	MS	275	C	U	296.4	237.0	215.0°	59.4
WMSI	Jackson	MS	275	C	L	296.4	237.0	215.0°	59.4
ALC	Shelbyville	TN	275	C1	U	234.9	211.0	48.7°	23.9
WZPC	Shelbyville	TN	275	C1	L	234.9	211.0	48.7°	23.9
WZPC	Shelbyville	TN	275	C1	C	234.9	211.0	48.7°	23.9
ALC	Moulton	AL	276	A	U	119.6	89.0	83.8°	30.6
WXKI	Moulton	AL	276	A	L	123.2	89.0	83.1°	34.2
WMBCFM	Columbus	MS	276	C2	L	117.4	117.0	179.5°	0.4
ALC	Jackson	TN	276	C2	U	124.3	117.0	348.3°	7.3
WMXXFM	Jackson	TN	276	C2	L	128.4	117.0	350.5°	11.4
WMXXFM	Jackson	TN	276	C2	C	128.4	117.0	350.5°	11.4
ALC	Como	MS	278	C1	U	68.8	76.0	283.7°	-7.2
WRBO	Como	MS	278	C1	C	131.5	76.0	292.8°	55.5
WRBO	New Albany	MS	278	C	L	30.1	96.0	269.0°	-65.9



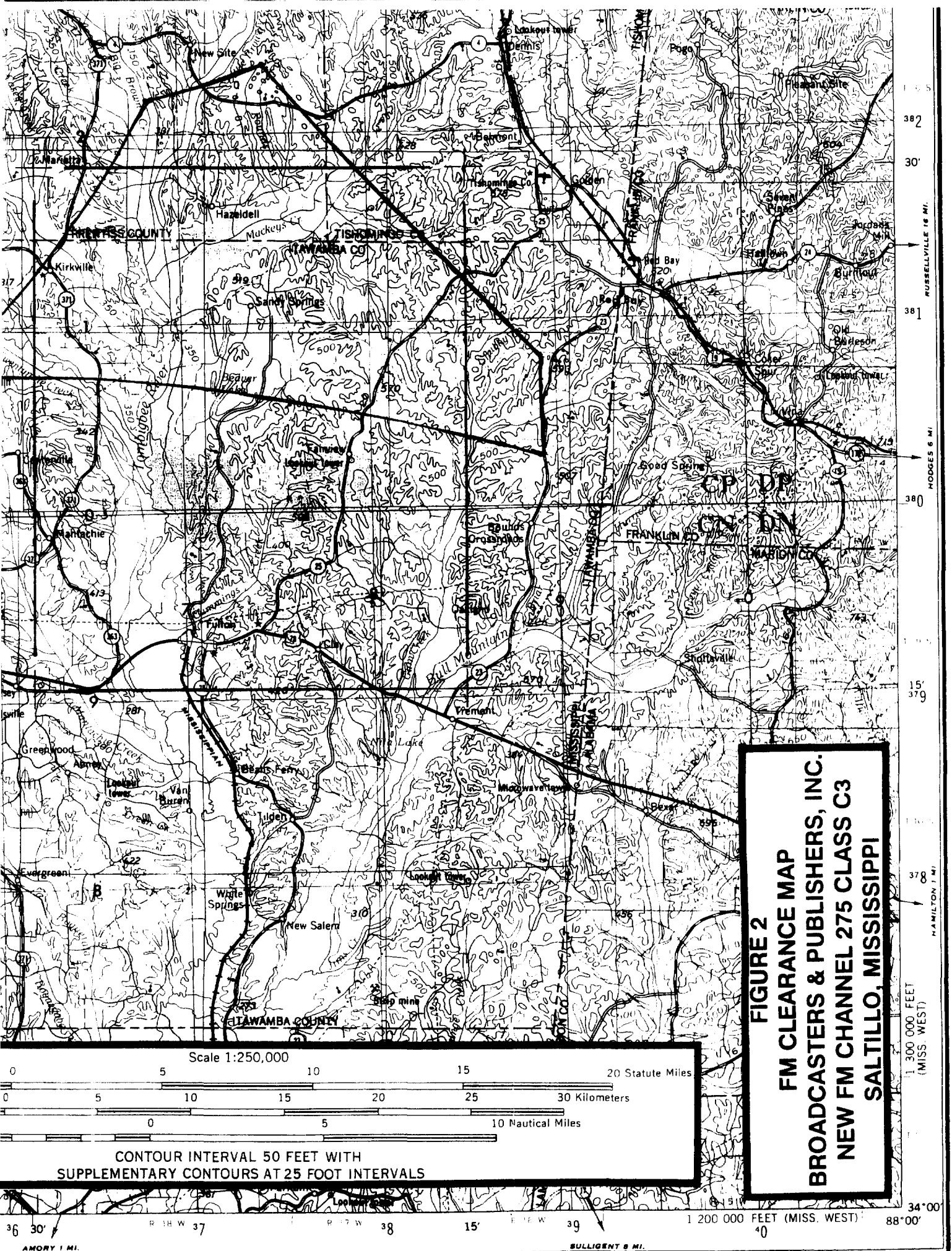
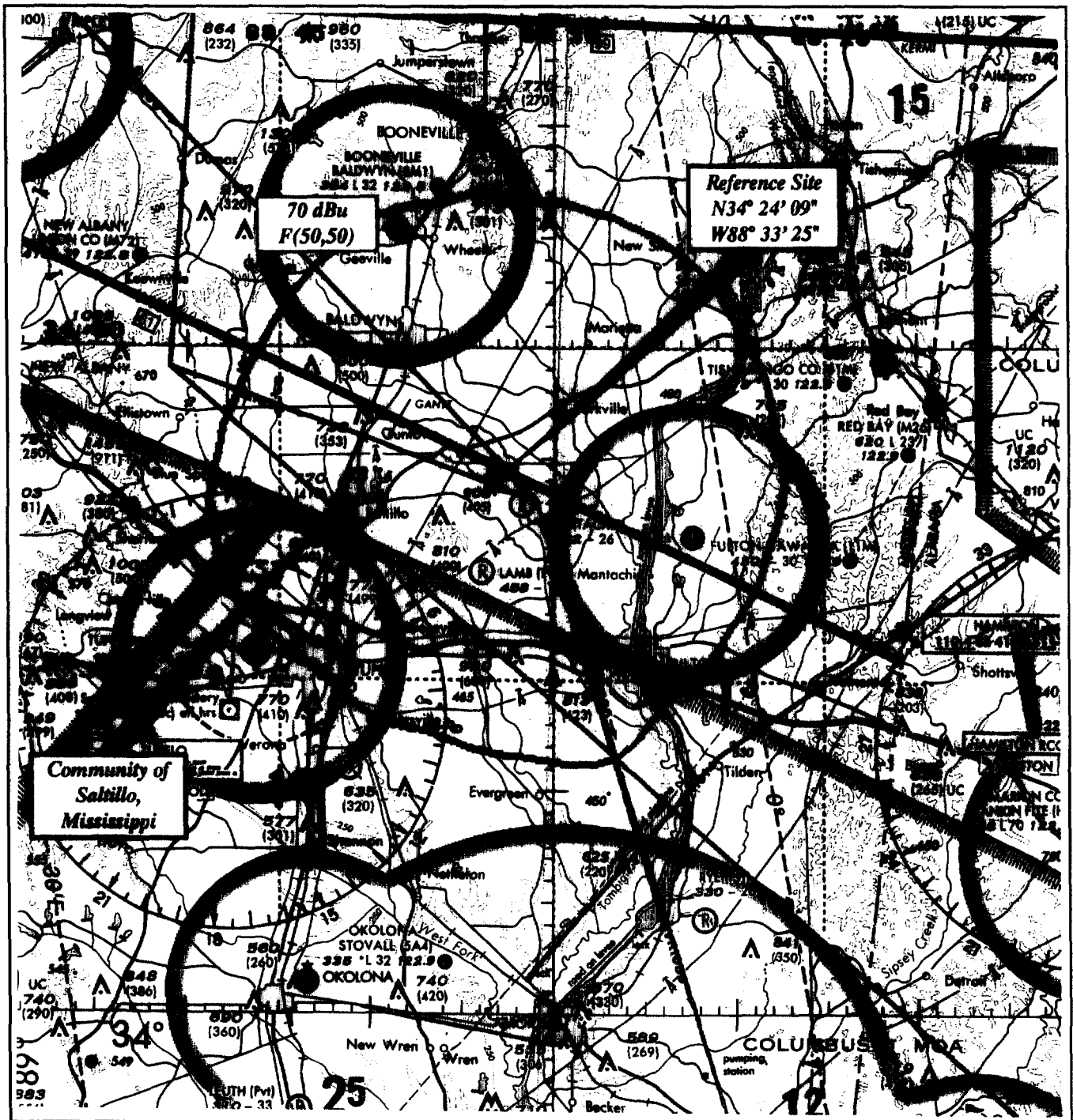
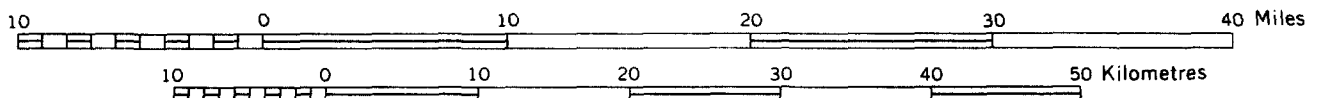


FIGURE 3
CITY GRADE COVERAGE CONTOURS
BROADCASTERS & PUBLISHERS, INC.
NEW FM CHANNEL 275 CLASS C3
SALTILLO, MISSISSIPPI



Scale 1:500,000

1 inch equals approximately 8 miles



CERTIFICATION

Kirk A. Tollett hereby certifies that;


He is President of Commsouth Media, Inc., a broadcast consulting firm based in Crossville, Tennessee;

His qualifications in broadcast matters are a matter of record before the Federal Communications Commission having been presented and accepted on many occasions in the past;

That he has been retained by Broadcasters & Publishers, Inc., for the purpose of developing technical exhibits and analyses of which this certification is a part;

That the accompanying technical report and exhibits were developed by him personally or under his immediate supervision and that all the information presented therein is true and correct to the best of his knowledge and belief.

Signed and dated this 7th day of August, 1998

A handwritten signature in black ink, appearing to read 'Kirk A. Tollett', is written over a horizontal line.

Kirk A. Tollett
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